

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

FORTRES GRAND CORPORATION,
an Indiana Corporation,

Plaintiff,

v.

WARNER BROS. ENTERTAINMENT
INC., a Delaware corporation,

Defendant.

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Civil Action No. 3:12 CV 535

Judge Philip P. Simon

**AGREED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendant Warner Bros. Entertainment Inc. (“Warner”), by its attorneys, respectfully moves for an extension of time to answer or otherwise plead pursuant to Local Rule 6-1(a). Plaintiff Fortres Grand Corporation (“Fortres”) has agreed to extend the time for Warner to answer to and including November 30, 2012. In support of this motion, Warner states as follows:

1. Fortres filed its Complaint on September 19, 2012.
2. Fortres served the summons and complaint on Warner on September 25, 2012.
3. Warner’s responsive pleading was originally due on October 16, 2012.
4. Counsel for Warner conferred with counsel for Fortres, and on October 12, 2012, counsel for Fortres agreed to Warner’s initial request for an extension of time to answer.
5. Pursuant to Local Rule 6-1(b), on October 22, 2012, Warner filed a notice extending the time to answer or otherwise plead to and including November 13, 2012.

6. Because the storms in New York in October temporarily shut down the office where some of Warner's attorneys work, Warner requested a second extension of time, to and including November 30, 2012, to which Fortres' counsel agreed.

7. The extension is sought for good cause and not for purposes of delay.

WHEREFORE, Defendant Warner hereby moves the Court for an order extending its time to answer or otherwise plead to and including November 30, 2012.

Respectfully submitted,

WARNER BROS. ENTERTAINMENT INC.,
a Delaware corporation

By /s/ Keith V. Porapaiboon
One of Their Attorneys

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Dated: November 7, 2012

CERTIFICATE OF SERVICE

I, Keith V. Porapaiboon, an attorney, hereby certify that I caused the foregoing document to be served upon the counsel of record, including the counsel listed below by utilizing the CM/ECF filing system on November 7, 2012.

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